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THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS

CIVIL ACTION # 4 :11 –CV- 564

PLAINTIFF(S)

**LORRINE ADAMORE
BERNICE ADAMORE – DECEASED / MOTHER**

VS.

SOUTHWEST AIRLINES CORPORATION ET.,AL,

WM. P. HOBBY AIRPORT ET, AL.

CITY OF HOUSTON ET. AL.,

DEPARTMENT HOMELAND SECURITY ET.,AL.,

AMMENDED COMPLAINT

*NOW COMES, THE MOVANT(S) WHOM FURTHER STATE(S), CLAIM(S), AVER(S)
THAT THE (16TH) AND (17TH) PARAGRAPH(S) OF THE PLAINTIFF(S) COM-
PLAINT / PETITION OF BEING WRONGFULLY AND UNLAWFULLY VIOLATED
DISCRIMINATELY, ATTEMPTED EXTORTION AND OR BEING TREATED
DIFFERENTLY THAN WHITE MALE(S) AVIATION TRANSPORTED CLIENT;
MARK DICKINSON AND OR HIS; (*see exhibits*) (17-
DYING / DECEASED GRANDSON HE HAD NEVER MET CADEN RODGERS
A YOUNG CHILD BY THE AFORECAPTIONED DEFENDANT(S) WERE IN-*

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ADVERTENLY OMMITTED FROM THE ORIGINAL COMPLAINT FILED ON 02/01/11
WITH THE CLERK OF COURT RECORD(S) 4 : 11 – CV -564 WHICH CONTAINED
THE FOLLOWING FACT(S), MERIT(S), GROUND(S) CONSISTANT WITH IT'S
ORIGNAL GIVING RISE TO CAUSE FOR CLAIM(S) OF INJURIES AND DAMAGE(S).
MOVANT(S) SEEK \$ 41. 5 MILLION DOLLARS FOR THE CONSPIRED ACT(S) OF
EXTOTION / DISCRIMINATORY ACT(S) – ACTION(S) AND THEIR UNWARRANTED
UNLAWFUL, WRONGFUL VIOLATION(S) OF THE CIVIL RIGHTS ACT OF 1964 .
SOME DEFENDANT(S) ARE SUBJECT TO U.S 1983 STATUS AS, WELL AGAINST
THE MOVANT(S). SUCH AS;

JOHN DOE VERIFICATION(S) IDENTIFICATION(S) DOCUMENTOR AN
HOMELAND SECURITY – TRANSPORTATION SECURITY OFFICER / INSPECTOR
DUTY OFFICER FOR THE TRANSPORTATION SECURITY ADMINISTRATION A
FEDERAL AGENCY OF THE UNITED STATES GOVERNMENT. HE IS NOT BLACK.

AMMENDED COMPLAINT
(* Cont'd from paragraph #15)

16). CHRISTINA DOE IS A WHITE FEMALE TRANSPORTATION MANAGER –
SUPERVISOR FOR SOUTHWEST AIRLINES CORP. @ WM. P. HOBBY AIRPORT
LOCATED IN THE CITY OF HOUSTON STATE OF TEXAS. , AND THAT SHE A
RESPONDEAT SUPERIOR OF HER WORKFORCE, GENE KELLY HER RESPON –

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DEAT SUPERIOR AS WELL AS ALL DEFENDANT(S) HERE-IN CONTAINED IN
4 : 11 – CV - 564 COMPLAINT / PETITION RESPONDEAT SUPERIOR(S) FAILED –
OMMITTED TO:

A). PROVIDE INTERVENE IN THE OVERSIGHT OF PASSENGER / BAGGAGE / AIR –
CARGO SECURITY SCREENING OPERATION(S), AIRPORT SECURITY RISK
ASSESSMENT(S), SECURITY TECHNOLOGY IMPLEMENTATION(S), CRISIS MAN-
AGEMENT(S), COMMUNICATION(S) NETWORKING, AND OTHER RELATED PRO-
GRAM(S) AS DIRECTED BY:

THE DEPARTMENT OF HOMELAND SECURITY

THE TRANSPORTATION SECURITY ADMINISTRATION

THE OFFICE OF THREAT TERRORIZING ASSESSMENT CREDENTIALING

THE AVIATION SECURITY ADMINISTRATION

THE STATE OF TEXAS

SOUTHWEST AIRLINES CORPORATION

WILLIAM P. HOBBY AIRPORT

AND OR:

B). DETERMINE THEIR INEFFECTIVENESS(ES) AND RECOMMEND ADJUST –
MENT(S) AS NEEDED AND OR:

C). PRACTICE / PROMOTE / OR IMPLEMENT PROGRAM(S) THAT WOULD HAVE
REINFORCED THEIR CRITICAL THINKING SKILL(S) , SPECIALIZED COM-
MUNICATION(S) TACTIC(S), THAT THEREBY IMPROVING THE ABILITY OF THEIR
WORKFORCE(S) TO MAKE INDEPENDENT / MANAGERIAL AND OR TRANS –
PORTATIONAL AND OR SECURITY BASED DECISION (S), BY USING AVAILIABLE

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INTELLIGENCE(S), CRITICAL THINKING SKILL(S), EXPERIENCE, OBSERVATIONS AND PASSENGER ENGAGEMENT(S) ON 02 / 01 / 10 @ WM. P. HOBBY AIRPORT @ SOUTHWEST AIRLINES CORPORATION TERMINAL(S).

D). ENSURE THAT THEIR ORGANIZATION(S) / COMPANIES / WORKFORCE APPLIED AND PROMOTED INTERGRATED CONFLICT MANAGEMENT(S) SYSTEM(S) CORE PRINCIPAL(S) AND COMPLY WITH IT'S APPLICABLE STANDARD(S).

E). MENTOR TEAM(S) AT ALL LEVEL(S) AND PROVIDE CONSTRUCTIVE FEED-BACK(S) THAT RECOGNIZES POSITIVE BEHAVIOR(S) AND PROMOTED THE DEFENDANT(S) INDIVIDUAL IMPROVEMENT(S), GROWTH(S), AND CONFIDENCE(S).

F). PROVIDE MANAGEMENT(S) AND TECHNICAL OVERSIGHT(S) TO THEIR STAFF MEMBER(S) AND PERFORM SUPERVISORY FUNCTION(S) / PERFORMANCE(S) EVALUATION(S) / DISCIPLINE(S) / TRAINING(S) AND MONITORING(S) ON 02 / 01 / 10 @ WM. P. HOBBY AIRPORT @ SOUTHWEST AIRLINES.

G). INTERACT WITH STAKEHOLDER(S) TO IDENTIFY AND RESOLVE THE DEFENDANT(S) OPERATIONAL ISSUE(S).

#17). MOVANT(S) FURTHER STATE(S), CLAIM(S), AND AVER(S) THAT AFTER BEING HARRASSED BY V.I.D /DUTY OFFICER AND LATER CHRISTINA DOE /T.M. O CHRISTINA DOE REISSUED THE TICKET FOR NEXT FLIGHT THREATNING TO

UPGRADE THE TICKET FROM COACH TO FIRST CLASS EVEN WHILE MOVANT
 BEGGED FOR MERCY AS NO FAULT OWN T.S.A. COULD^{NOT} READ OR UNDERSTAND
 OR ACCEPT THE MOVANT'S VALID STATE OF TEXAS ISSUED GOVERNMENT
 I.D. AND OR THE STATE OF ILLINOIS NOTORIZED BIRTH CERTIFICATE FROM
 THE BEREAU OF VITAL STATISTIC(S) AND THEREFORE WAS NOT ALLOWED TO
 BE SEARCHED TO ACCESS GATE TO BOARD THEIR AIRCRAFT. WHEN THE MO-
 VANT WENT THROUGH SCREENING ON THE REISSUED TICKET AND WAS ASK-
 ED TO PLACE HER ~~FINGER(S)~~ / HAND(S) ON THE FINGERPRINT GLASS THE
 ALARM WENT OFF CRAZY AND EXTREMELY LOUD MOVANT WAS TOLD THAT
 IT RESULTED IN MOVANT TO HAVE TO BE SUBJECTED TO AN INTENSIFIED
 SEARCH OF HER PERSON. AFTER THE SEARCH WAS FINISHED MOVANT WAS
 THEN ADVISED THAT HER FLIGHT WAS NOW BOARDING FOR TAKE-OFF AND
 THAT SHE WOULD MISS IT, PANICKING THE MOVANT WENT TO GRAB BAG(S)
 TO GET FLIGHT BUT WAS STOPPED BY THE T.S.O. INSPECTOR(S) WHOM SAID
 MOVANT WOULD NEVER MAKE FLIGHT AND SUMMONED THE AIRCRAFT(S)
 TERMINAL(S) AVIATION BAGGAGE / CARGO TRANSPORTER(S) JANE AND
 JOHN DOE WHOM ARGUED THE ENTIRE RIDE FROM THE TIME THEY PICKED
 UP THE PLAINTIFF OVER WHAT GATE TO TAKE MOVANT TO FINALLY *JOHN
 DOE* SHOUTS OUT I'M DRIVING AND I TAKING HER TO THE GATE I WANT TO.
 *JANE DOE THEN ABRUPTLY SHUTS UP AND STOPS ARGUING WITH *JOHN
 DOE*. LATER THE MOVANT FOUND OUT THAT SHE WAS TAKEN TO THE
 WRONG GATE AND THAT MVANT'S FLIGHT WAS ALREADY AIRBORNE. MOVANT
 WENT BACK TO CUSTOMER SERVICE CHRISTINA DOE WHO WAS FURIOUS AT

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THE MOVANT AND RIGHT THEN AND THERE DID UPGRADE MOVANT'S FLIGHT BOARDING PASS FROM COACH TO FIRST CLASS AND OR FROM \$99.00 TO - \$600.00 THE MOVANT WAS DEVASTED AS SHE WAS TRYING TO GET TO DYING 83 YEARS OLD (WHICH PLAINTIFF KNEW) MOM HER ENTIRE LIFE AND TOLD CHRISTINA DOE THAT THE FIRST MEETING AND AT THIS MOMENT TO NO AVAIL. ALL THE AFOREMENTIONED ACT(S) COMMITTED BY THE DEFENDANTS CAUSED THE PLAINTIFF(S) MOVANT'S INTENTIONAL INFLICTION(S) OF EXTREME EMOTIONAL DISTRESS(ES), INTENTIONAL ABUNDANCE(S) OF MENTAL ANGUISH(ES), DEEP GREAT DEPRESSION(S) & SORROW(S), PAIN & SUFFERING(S) OF NOT BEING AT BEDSIDE OF DYING MOM (HER OLDEST DAUGHTER) WAS DONE WANTONLY / BLATANTLY IN TOTAL DISREGARD OF THE PLAINTIFF MOVANT(S) CONSTITUTIONAL / CIVIL RIGHTS ACT(S) / DISCRIMINATION LAW(S) OF THESE UNITED STATES OF AMERICA IN BAD FAITH , CAUSING THE MOVANT(S) SHAME(S) / EMBARRASSMENT(S) / HUMILIATION(S) AND LOSS OF COMPANIONSHIP(S) EVEN TO DEATH BECAUSE OF THE MOVANT'S RACE BEING BLACK , BECAUSE OF THEIR SEX(ES) BEING FEMALE(S) AND DISABILITIES BECAUSE OF THEIR AGE(S) 54YRS. OLD AND 83 YRS. OLD ALL OF THE DEFENDANT(S) / THEIR RESPONDEAT SUPERIOR(S) WHOM OWED THE PLAINTIFF(S) /MOVANT(S) A REASONABLE DUE STANDARD OF CARE CONSIDERED TO ¹ TREATED THE PLAINTIFF(S) VERY DIFFERENTLY THAN THAT OF (02) YOUNG WHITE MALE(S) WHEN BEING SERVICED THROUGH THEIR ORGANIZATION(S) ,COMPANIES , AGENCIES , DEPARTMENT(S) , TERMINAL(S) AND WORKFORCE(S) AND CITIES AND STATES), ON 01/05/11,

[REDACTED]

(11)

WHEREBY THE MOVANT(S) HAS SUSTANTIATED LEGAL , LAWFUL ,
GROUND(S), REASON(S) , FACT(S), MERIT(S) GIVING RISE TO THIS CAUSE
PETITION OF DISCRIMINATION(S) OF A PUBLIC ACCOMODATION(S) ,
ATTEMPTED EXTORTION(S) FOR HIGHER AIRFARE(S) (WHICH DID'NT
INCLUDE THE ADVANCED PAID IN FULL RETURN TRIP FARE CALCU-
LATED INTO THAT SUM AND MOVANT NEVER RECEIVED REFUND EITHER
FROM UNUSED TICKET) @ WILLIAM P. HOBBY AIRPORT 7800 AIRPORT
BLVD., @ SOUTHWEST AIRLINES CORPORATION'S AIRCRAFT(S) TER -
MINAL(S). AND THAT MARK DICKINSON A YOUNG WHITE MAN WAS TREAT
ED DIFFERENTLY WHEN HE HAD SAME PLIGHT OF PLAINTIFF(S) . EXCEPT
CADEN RODGERS WAS ALREADY DECEASED AND MARK DICKINSON HAD
NEVER EVEN MET HIS GRANDSON. SOUTHWEST AIRLINES CORP. / TERM-
NAL(S) AT HOUSTON HOBBY & L.A.X. TERMINAL(S) TREATED THE PLAIN-
TIFF(S) DIFFERENTLY BECAUSE OF THE RACE(S), SEX(ES), AND AGE(S) OF
THE MOVANT(S) AND HAD IT NOT BEEN FOR THE DISCRIMINATORY,
CONCERTED ACT UNLAWFUL ACT(S) OF THE DEFENDANT(S) THE MOVANT
WOULD HAVE BEEN AT BEDSIDE TOGETHR WHILE THERE WAS STILL LIFE
AND BREATH IN BERNICE ADAMORE ON 02 /01 / 10 SHE DIED ON 02/ 02/ 10
WITHOUT A FINAL GOODBYE TO HER FIRST AND OLDEST DAUGHTER
LORRINE ADAMORE 54 YRS. OLD LIVING IN ANOTHER STATE, NEEDLESS
TO SAY PLAINTIFF(S) MOVANT(S) SEEKS CLAIMS FOR DAMAGES AND
INJURIES SUSTAINED FOR THE WRONGFUL DISCRIMINATION(S) /ATTEMPT-
ED EXTORTION(S) DAMAGES IN THE SUMS OF \$ 41 . 5 MILLION DOLLARS

FOR EACH / PER COUNT (08) COUNTS AND MOVANT(S) SEEKS FOR CLAIM(S) OF
RELIEF(S) FOR RETALIATION, SUM(S) FOR JUDGEMENT IN THE AMOUNT OF:
\$ 75 MILLION DOLLARS FOR THE NINTH (09) COUNT

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AS THERE IS NO JUST REASON WHY THE JUDGEMENT SHOULD NOT BE IMMEDIATELY GRANTED, DECREED AND ORDERED IN THE AMOUNT OF \$ 41.5 MILLION DOLLARS TO BE ENTERED INTO THE CLERK OF RECORDS FOR THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS ON BEHALF OF THE PLAINTIFF(S) /MOVANT(S) LORRINE /BERNICE ADAMORE. THE PLAINTIFF(S) PRAYS THAT THE HONORABLE PRESIDING JUDGE WILL IMMEDIATELY MOVE THE BENCH TO GRANT , DECREE AND ORDER THE JUDGEMENT OF \$ 41.5 MILLION DOLLARS TO BE ENTERED INTO THE CLERK OF COURT RECORDS AS THERE IS NO JUST REASON WHY THE JUDGEMENT SHOULD NOT BE GRANTED AND IMMEDIATELY ENTERED INTO

THEREOF FOR THE PLAINTIFF(S) OF 4 : 11 - CV - 564, PER (C8) COUNT(S) AND (C11) COUNT OF RETALIATION / PUNITIVE DAMAGES IN THE AMOUNT OF \$75 MILLION DOLLARS
PLAINTIFF(S) DEMANDS JURY TRIAL

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